

Hearing Date: September 25, 2019 at 10:00 a.m. (ET)  
Objection Deadline: September 18, 2019 at 4:00 p.m. (ET)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

Jointly Administered

**NOTICE OF HEARING ON MOTION OF DIRECTOR DEFENDANTS  
FOR ENTRY OF AN ORDER MODIFYING THE AUTOMATIC STAY,  
TO THE EXTENT APPLICABLE, TO PERMIT PAYMENT OF  
DEFENSE COSTS UNDER THE DIRECTORS & OFFICERS POLICIES**

**PLEASE TAKE NOTICE** that a hearing (the “Hearing”) on the *Motion of Director Defendants for Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Permit Payment of Defense Costs Under the Directors & Officers Policies* (the “Motion”) will be held on September 25, 2019 at 10:00 a.m. (Eastern Time), before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (the “Objections”) to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedures and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court and served in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures* [Docket No. 405], so as to be filed and received no later than September 18, 2019 at 4:00 p.m. (Eastern Time) (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no Objections are timely filed and served with respect to the Motion, the Director Defendants may submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or an opportunity to be heard.

Dated: August 8, 2019  
New York, New York

Respectfully submitted,

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